These are my comments on the proposed Broadband over Power Line (BPL), In Home and Access services, FCC NOI 03-104.

1) Spectrum conservation: Amateur radio operators, commercial radio and TV stations, business users, aeronautical and other point-to-point services are all being pressured to use less spectrum as RF technology develops. I would highly recommend that the Commission stop encouraging any development of a radiating wide band system such as Access BPL. Such a system has the potential to turn the entire HF spectrum into a one-user commodity because of the extreme interference to incumbent, licensed users.

2) Spectrum and bandwidth (paragraph 15): The bandwidth of a system should be matched to the delivery media. All users of the HF spectrum use narrow band modulation techniques. I recommend that the Commission encourage development of narrow-band Power Line Communication standards for use in selected portions of the HF spectrum. One possibility is a low power, channelized system at lower HF frequencies where propagation will not cause interference to licensed users in distant locations. Amateur radio operators have used a variety of digital modulation techniques while maintaining bandwidths on the order of 3 kHz.

3) Interference from BPL emissions (paragraph 18): I believe the Commission has an obligation to protect current licensed users in all parts of the radio spectrum. As an amateur radio operator, if my transmitter interferes with a neighbor's TV any interference is TOO much interference. Likewise, I recommend that any interference from an unlicensed PLC system would be too much interference to any licensed users. I would like to see the Commission conduct a study of interference to other users mentioned in this paragraph – especially law enforcement, military, aeronautical, maritime, and land mobile users.

4) Compliance measurement methods (paragraph 21): I understand that compliance measurements depend on a certain bandwidth, a certain noise floor, frequency spans and limit lines. I would make the compliance specifications commensurate with the bandwidths and sensitivities of existing users of the HF spectrum. In other words use

a narrow measurement bandwidth, 1 to 10 kHz, and a low limit line comparable to modern receiver sensitivities.

5) Interference potential from BPL equipment (paragraph 26): The American Radio Relay League has made measurements and observations using typical amateur radio equipment. It is plain to see, and hear, that the proposed BPL system would render HF amateur radio almost useless. As it is today, BPL is a totally unacceptable use of the HF spectrum.

6) The amateur radio community has performed countless acts of public service for decades. Just last week, during the massive power failure in the Northeast, radio amateurs must have played a tremendous role in assisting local law enforcement. During the most recent hurricane in the Gulf radio amateurs passed emergency traffic. I would like to see the Commission continue to support the amateur radio service and all other licensed users by protecting the HF spectrum from degradation caused by wide-band Access BPL.

Thank you,

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